

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

ELIJAH BILAL,

Defendant.

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**PROTECTIVE ORDER**

19 Cr. 565 (JPO)

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Upon the application of the United States of America, DAMIAN WILLIAMS, United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Peter J. Davis, Emily A. Johnson, and Thomas John Wright, of counsel, for an order precluding the dissemination of material produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972), and the Government's general disclosure obligations or practices, relating to (1) witnesses the Government anticipates may be called to testify at trial, and (2) individuals the Government does not anticipate calling at trial (collectively, the "3500 Material"), made on consent, and based on the Court's independent review, it is hereby

ORDERED that (1) defense counsel must destroy or return to the Government all 3500 Material (and any copies thereof) at the conclusion of the trial of this matter or when any appeal has become final; (2) the defense is precluded from disseminating any

of the 3500 Material (and any copies thereof) to anyone beyond the defendant, defense counsel, and any paralegal or staff employed by the defense; (3) the defendant is precluded from taking any 3500 Material (or any copies thereof) with them into any jail facility, or possessing any 3500 Material or copies thereof in any jail facility, either before, during, or after trial; except that while in a jail facility the defendant may review the 3500 Material, in the possession of defense counsel and/or any paralegal or staff employed by the defense, when in the presence of defense counsel or any paralegal or staff employed by the defense; and (4) any 3500 Material designated "ATTORNEY'S EYES ONLY" shall not be disseminated to the defendant or anyone else beyond defense counsel and any paralegal or staff employed by the defense, nor shall the names of witnesses reflected in such material be disclosed to the Defendant.


FURTHER ORDERED that if counsel for the defendant determines that the information provided is material and relevant to the investigation and defense of their client and requires counsel to share the information subject to this protective order with their client, counsel for the defendant reserves the right,

on notice to the Government, to seek permission from the Court to do so.

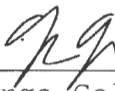
AGREED AND CONSENTED TO:

DAMIAN WILLIAMS  
United States Attorney

By:

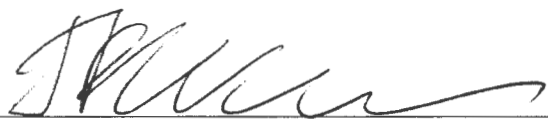
  
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Peter J. Davis  
Emily A. Johnson  
Thomas John Wright  
Assistant United States Attorneys

Date: May 2, 2022

  
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George Goltzer  
Louis M. Freeman  
Ying Stafford  
Counsel for Defendant Elijah Bilal

Date: May 5, 2022

Dated: New York, New York  
May 7, 2022

  
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THE HONORABLE J. PAUL OETKEN  
UNITED STATES DISTRICT JUDGE